

EXHIBIT 109

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REDACTED



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<p style="text-align: right;">Page 54</p> <p>1 understand what we needed to do.</p> <p>2 BY MR. MOUGEY:</p> <p>3 Q. The question I asked you was a little</p> <p>4 different. What I asked was: Is it important for you</p> <p>5 as a manager of the southern operation to have an</p> <p>6 understanding of the regulatory framework covering</p> <p>7 Walgreens' responsibilities in relation to monitoring</p> <p>8 of Schedule II and Schedule III opiates?</p> <p>9 MR. HILL: Object to the form.</p> <p>10 BY THE WITNESS:</p> <p>11 A. I -- I don't know how to answer that</p> <p>12 question.</p> <p>13 BY MR. MOUGEY:</p> <p>14 Q. What's confusing to you about that</p> <p>15 question? Is it important that you understand the</p> <p>16 regulatory framework?</p> <p>17 MR. HILL: Same objection.</p> <p>18 BY THE WITNESS:</p> <p>19 A. I think I have a general concept, but I</p> <p>20 don't think I'm an expert on all of the issues at</p> <p>21 every level of government, no.</p> <p>22 BY MR. MOUGEY:</p> <p>23 Q. Yeah, I don't -- I don't think I asked you</p> <p>24 about whether you were an expert at every level of</p>	<p style="text-align: right;">Page 56</p> <p>1 paragraph in your LinkedIn profile, correct?</p> <p>2 A. This is copied from my job posting.</p> <p>3 Q. Yes, sir. So you put this in there,</p> <p>4 right?</p> <p>5 A. I copy and pasted, yes.</p> <p>6 Q. You copied it. And it's accurate,</p> <p>7 correct?</p> <p>8 A. I believe so.</p> <p>9 Q. So Bratton 1, your profile: "Responsible</p> <p>10 for managing, creating, and maintaining controlled</p> <p>11 substance dispensing, monitoring and reporting</p> <p>12 programs."</p> <p>13 Is that accurate, sir?</p> <p>14 A. Yes.</p> <p>15 Q. And that was part of the scope of your</p> <p>16 responsibilities from February '13 on?</p> <p>17 A. Correct.</p> <p>18 Q. Second sentence:</p> <p>19 "Developed, recommends, implements</p> <p>20 programs, procedures and techniques which will</p> <p>21 identify and minimize loss of company assets and</p> <p>22 ensure the safety, compliance and security of the</p> <p>23 ordering and dispensing of controlled substances,"</p> <p>24 correct?</p>
<p style="text-align: right;">Page 55</p> <p>1 government. What I asked was is it important as a</p> <p>2 manager of the southern operation for Walgreens in</p> <p>3 pharmaceutical integrity to understand, just</p> <p>4 generally, the regulatory framework covering</p> <p>5 Walgreens' responsibilities in relation to monitoring</p> <p>6 Schedule II and Schedule III opiates?</p> <p>7 MR. HILL: Objection to the form.</p> <p>8 BY THE WITNESS:</p> <p>9 A. I'm not sure.</p> <p>10 BY MR. MOUGEY:</p> <p>11 Q. Has someone instructed you to -- to say</p> <p>12 "I'm not sure" to questions about what Walgreens'</p> <p>13 responsibilities were?</p> <p>14 A. No.</p> <p>15 Q. Have you been told just to -- if -- if</p> <p>16 anyone asks you about what Walgreens' responsibilities</p> <p>17 were, just to say I'm not sure?</p> <p>18 A. I'm trying to answer truthfully.</p> <p>19 Q. Well, let's go back to Bratton 1, okay.</p> <p>20 Manager of pharmaceutical integrity,</p> <p>21 southern operation, February 2013 to the present,</p> <p>22 right?</p> <p>23 A. Um-hum.</p> <p>24 Q. Okay. Now, you -- you put this next</p>	<p style="text-align: right;">Page 57</p> <p>1 A. Correct.</p> <p>2 Q. Now, when you say controlled substances</p> <p>3 in -- in this paragraph, that is a number of different</p> <p>4 types of drugs, correct?</p> <p>5 A. Correct.</p> <p>6 Q. And you understand that this litigation is</p> <p>7 about Schedule II and Schedule III opiates, correct,</p> <p>8 sir?</p> <p>9 A. Correct.</p> <p>10 Q. And you understand, sir, in your role as</p> <p>11 manager of the southern operation that those</p> <p>12 Schedule II and Schedule III opiates are highly</p> <p>13 addictive, correct?</p> <p>14 MR. HILL: Object to the form.</p> <p>15 BY THE WITNESS:</p> <p>16 A. My understanding is they can be addictive</p> <p>17 for some people.</p> <p>18 BY MR. MOUGEY:</p> <p>19 Q. Yes, sir, they can be addictive to some</p> <p>20 people.</p> <p>21 And did you understand in February</p> <p>22 of 2013, that the country was in the midst of an</p> <p>23 opiate crisis?</p> <p>24 MR. HILL: Object to the form.</p>

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<p style="text-align: right;">Page 58</p> <p>1 BY THE WITNESS:</p> <p>2 A. I believe that I was becoming aware of it,</p> <p>3 yes.</p> <p>4 BY MR. MOUGEY:</p> <p>5 Q. And how did you become aware of that in</p> <p>6 February of 2013?</p> <p>7 A. Partially through my -- my work,</p> <p>8 partially, you know, you -- the news and things you</p> <p>9 see on television.</p> <p>10 Q. Well, let's talk about the partially</p> <p>11 because of your work.</p> <p>12 How at work did you become aware that in</p> <p>13 2013 the country was in the middle of an opiate</p> <p>14 crisis?</p> <p>15 A. I don't recall the specific details. I</p> <p>16 know that we -- it was something that was, you know,</p> <p>17 in our minds as we were drafting our policies and</p> <p>18 procedures.</p> <p>19 Q. It was in your mind.</p> <p>20 Help -- help me to understand how it got</p> <p>21 in your mind?</p> <p>22 A. Direction from my boss --</p> <p>23 Q. Ms. Polster?</p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 60</p> <p>1 BY MR. MOUGEY:</p> <p>2 Q. You don't recall. You don't recall</p> <p>3 walking in the first month of my job and somebody</p> <p>4 saying, We are in the middle of an opiate crisis,</p> <p>5 people are dying every day, Florida is the hot bed,</p> <p>6 you are in charge of the southern operation, there is</p> <p>7 drugs migrating up to Ohio, and it is our job as</p> <p>8 distributors to monitor and identify controlled</p> <p>9 substances?</p> <p>10 Anything along those lines?</p> <p>11 MR. HILL: Objection to the form.</p> <p>12 BY THE WITNESS:</p> <p>13 A. I don't recall.</p> <p>14 BY MR. MOUGEY:</p> <p>15 Q. Anything saying this is -- this is very,</p> <p>16 very, very important that we are on the front line of</p> <p>17 defense for Walgreens and we dispense as -- as many --</p> <p>18 or more opiates than anyone in the country?</p> <p>19 A. I don't recall.</p> <p>20 Q. You don't recall any meetings with a sense</p> <p>21 of urgency like that?</p> <p>22 A. I -- when I first was in the role, we were</p> <p>23 very focused on the settlement with the DEA and the</p> <p>24 provisions that our legal teams had outlined that we</p>
<p style="text-align: right;">Page 59</p> <p>1 Q. And when you say "direction," what do you</p> <p>2 mean?</p> <p>3 A. We would meet in meetings with our -- my</p> <p>4 peers or our team members and discuss issues and she</p> <p>5 would provide direction as to programs we should work</p> <p>6 on.</p> <p>7 Q. Did anybody ever tell you that there had</p> <p>8 been ongoing congressional investigations into the</p> <p>9 opiate crisis almost 13 years by the time you started</p> <p>10 in 2013?</p> <p>11 A. No.</p> <p>12 Q. Did anybody tell you that there was year</p> <p>13 upon year upon year increase in the amount of opiates</p> <p>14 dispensed across the country?</p> <p>15 A. I knew that. I don't know that anyone at</p> <p>16 work told me that.</p> <p>17 Q. Did anyone ever as part of your training</p> <p>18 advise you that the amount of deaths had increased,</p> <p>19 overdose deaths related to Schedule II and</p> <p>20 Schedule III opiates had increased exponentially</p> <p>21 beginning in late '90s, early 2000s?</p> <p>22 MR. HILL: Objection to the form.</p> <p>23 BY THE WITNESS:</p> <p>24 A. I don't recall.</p>	<p style="text-align: right;">Page 61</p> <p>1 needed to implement. That was one of the critical</p> <p>2 focuses at that time.</p> <p>3 Q. And the -- in the midst of the</p> <p>4 investigations by the DEA, what are you referring to?</p> <p>5 A. The -- when I was there, it was the</p> <p>6 settlement agreement that we had signed and so we</p> <p>7 received a laundry list of -- of tasks and programs</p> <p>8 and changes that we were working to implement.</p> <p>9 Q. And that was in -- the agreement was</p> <p>10 signed.</p> <p>11 Do you have a recollection of when the</p> <p>12 agreement was signed?</p> <p>13 A. Shortly after I started.</p> <p>14 Q. Like in June of 2013?</p> <p>15 A. That sounds right.</p> <p>16 Q. Were -- did anyone alert you or notify you</p> <p>17 from your date in February of '13 until the date the</p> <p>18 agreement was signed about the ongoing investigations?</p> <p>19 A. We were in discussions about the terms of</p> <p>20 the settlement and what that might include. Some of</p> <p>21 the things that the government had already outlined</p> <p>22 that we had committed to.</p> <p>23 Q. Including the closing of six Walgreens'</p> <p>24 stores in Florida, correct?</p>

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